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UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY

IN RE:

Joy Birdsong

Debtor(s).

CHAPTER 13

CASE NO. 20-22260-JNP

CERTIFICATION CONTRA
NOTICE OF REQUEST FOR
MORTGAGE FORBEARANCE

I, Lee M. Perlman, Counsel for Debtor, Joy Birdsong, being of full age, hereby certify as follows:

1. The instant case was initiated by the filing of a Chapter 13 petition and plan on 10/30/2020.
2. On 2/11/2021, PNC Bank, National Association ("PNC") filed a Notice of Request for Mortgage Forbearance alleging that the "parties agree" to a mortgage forbearance for the period from 2/1/2021 through 4/1/2021. *See*, Claim
3. Debtor did not request a mortgage forbearance for the stated time period, does not want a mortgage forbearance for that time period, and did not authorize PNC to file the Notice of Mortgage Forbearance.
4. This certification is made in opposition to Notice of Mortgage Forbearance, and said notice should be stricken and held to be of no force and effect.

I certify that the foregoing statements made by me are true and correct. I am aware that if any of the statements contained herein are willfully false, I am subject to punishment.

2/25/21
Date

/s/ Lee M. Perlman
Lee M. Perlman